

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

DELAWARE AUDUBON SOCIETY, )  
CENTER FOR FOOD SAFETY, and )  
PUBLIC EMPLOYEES FOR )  
ENVIRONMENTAL RESPONSIBILITY, )  
)  
Plaintiffs, )  
v. ) Civil Action No. 06-223 GMS  
)  
Secretary, Department of the Interior, DALE )  
HALL, Director of United States Fish and )  
Wildlife Service, and UNITED STATES )  
FISH AND WILDLIFE SERVICE, an )  
administrative agency of the United States )  
Department of the Interior, )  
)  
Defendants.

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**UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT**

Pursuant to Fed. R. Civ. P. 7, the Federal defendants move the Court for an extension of time for response to the Complaint for Declaratory and Injunctive Relief filed on April 5, 2006 by Plaintiffs in this matter. The Federal defendants request that this Court enter an order extending the time for response to the Complaint until August 11, 2006. The Federal defendants request this extension in order to continue discussions with the Plaintiffs to determine if this matter may be settled.

Counsel for Plaintiffs has been consulted and does not oppose this motion.

THEREFORE, the Federal defendants move this court for an order extending the time for

response to the Complaint until August 11, 2006. A proposed form of order is attached.

Dated this 4th day of August, 2006

Respectfully submitted,

SUE ELLEN WOOLDRIDGE  
Assistant Attorney General

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U.S. Department of Justice  
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General Litigation Section  
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COLM F. CONNOLLY  
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By: /s Douglas E. McCann

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Attorney for Defendants

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HALL, Director of United States Fish and	)	
Wildlife Service, and UNITED STATES	)	
FISH AND WILDLIFE SERVICE, an	)	
administrative agency of the United States	)	
Department of the Interior,	)	
	)	
Defendants.		

**ORDER**

AND NOW, having considered the Defendants' Unopposed Motion for Extension of Time to Respond to the Complaint, IT IS HEREBY ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2006 that the Motion is GRANTED. The Defendants shall answer or otherwise respond to the Complaint on or before August 11, 2006.

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UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I Douglas E. McCann, hereby certify that I caused the foregoing Unopposed Motion for Extension of Time to Respond to the Complaint to be served this 4th day of August, 2006, on the following counsel in the manner indicated:

**BY CM/ECF**

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/s/ Douglas E. McCann  
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